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May 3, 2023

VIA ECF

The Honorable John F. Murphy
United States District Court for the Eastern District of Pennsylvania
601 Market Street, Rm. 3809
Philadelphia, PA 19106

Re: Kitchens v. National Board of Medical Examiners, No. 2:22-cv-03301

Dear Judge Murphy,

I am writing this letter in the above-referenced case. I am seeking leave of the Court to bring in an expert witness on the issue of expungement. The expert, Dr. Joanne Senoga, M.D., Ph.D. will address why an expungement is necessary, how an examinee's transcript follows them throughout their career, and the impacts of a failing score on the transcript without an expungement.

As the parties have already agreed that no expert depositions nor reports will be exchanged-required prior to trial, should the Court grant leave, her testimony will be included in plaintiff's substantive summary of expert depositions due on Monday, May 8th. Pursuant to Local Rules 16.1(c)(4) and 16.1(d)(1)(b), Dr. Senoga's addition need only be included in the Pre-Trial Memorandum to allow her to be called during trial. I have also notified opposing counsel of the additional expert and have taken all necessary measures to ensure that they are not unduly harmed by the addition.

I believe that Dr. Senoga's testimony is necessary to fully and accurately present my case, and I respectfully request that the Court grant leave to bring in this witness. I understand the importance of the Court's time and resources and assure you that I will make every effort to ensure that the witness's testimony is efficient, relevant, and limited to the issues at hand.

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Dr. Marcus Kitchens

Dr. Marcus Kitchens

Pro Se Plaintiff

cc: Caroline Mew (via ECF and E-mail)
Jared Bayer (via ECF and E-mail)